

Michael P. McCloskey, Esq. (SBN106051)  
Sarena Kustic, Esq. (SBN 292715)  
WILSON, ESLER, MOSKOWITZ,  
EDELMAN & DICKER LLP  
401 West A Street, Suite 1900  
San Diego, CA 92101  
Telephone: (619) 321-6200  
Facsimile: (619) 321-6201  
email: [michael.mccloskey@wilsonelser.com](mailto:michael.mccloskey@wilsonelser.com)  
[sarena.kustic@wilsonelser.com](mailto:sarena.kustic@wilsonelser.com)

*Attorneys for PAYAM BOZORGI*

CAROLYN CHANG (217933)  
[carolyn@martonribera.com](mailto:carolyn@martonribera.com)  
RYAN J. MARTON (223979)  
[ryan@martonribera.com](mailto:ryan@martonribera.com)  
MARTON RIBERA SCHUMANN & CHANG LLP  
548 Market Street, Suite 36117  
San Francisco, CA 94104  
Tel.: (415) 360-2511

*Attorneys for The Regents of the University of California.*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA, and TiMEMS, INC., a  
California corporation,

Plaintiffs and  
Counterclaim Defendant,

v.

LTI FLEXIBLE PRODUCTS, INC. d/b/a  
BOYD CORPORATION, a Minnesota  
corporation

Defendant and  
Counterclaim Plaintiff

Case No: 3:20-cv-08686-WHO

**STIPULATION AND ORDER TO  
CONTINUE HEARING ON MOTION  
FOR ATTORNEYS' FEES AND TO  
EXTEND OPPOSITION AND REPLY  
DEADLINES**

Judge: Hon. William Orrick  
Courtroom: 2

Hearing Date: November 30, 2022  
Time: 2:00 p.m.

Pursuant to Local Rules 6-1 and 6-2, Third-Party Defendant Payam Bozorgi (“Bozorgi”) and Third-Party Plaintiff The Regents of the University of California (“The Regents”), by and through their respective counsel of record (collectively, the Parties”) hereby stipulate and agree, subject to the Court’s approval as follows:

WHEREAS, on October 25, 2022, Bozorgi filed a motion for attorneys’ fees (Dkt#159);

WHEREAS, The Regents’ Opposition is due November 8, 2022;

WHEREAS, Bozorgi’s Reply is due November 15, 2022;

WHEREAS, the hearing on Bozorgi’s motion for attorneys’ fees is set for November 30, 2022 at 2:00 p.m.;

WHEREAS, the Parties are continuing to confer regarding whether and to what extent The Regents may oppose Bozorgi’s motion for attorneys’ fees;

WHEREAS, The Regents requested a two-week extension on the deadlines for the Parties’ respective Opposition and accordingly a continuance of the November 30, 2022 hearing date;

WHEREAS, The Parties have met and conferred (*see* Chang Decl.) and good cause exists to continue the hearing date and extend the Parties’ Opposition and Reply deadlines;

NOW THEREFORE, the Parties stipulate as follows:

1. All dates not modified by this Stipulation and Order remain as previously set by the Court.

2. The hearing on the Motion for Attorneys’ Fees (Dkt#159) shall be continued from November 30, 2022 to December 14, 2022, at 2:00 p.m.;

3. The Regents’ Opposition to the Motion shall be due November 22, 2022;

4. Borzorgi’s Reply to the Motion shall be due November 29, 2022.

SO STIPULATED.

Dated: November 7, 2022

Respectfully submitted,

MARTON RIBERA SCHUMANN & CHANG LLP

By: /s/ Carolyn Chang  
Carolyn Chang

CAROLYN CHANG (SBN 217933)

[carolyn@martonribera.com](mailto:carolyn@martonribera.com)

MARTON RIBERA SCHUMANN & CHANG LLP

548 Market Street, Suite 36117

San Francisco, CA 94104

Telephone: (415) 360-2514

*Attorneys for* THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA

WILSON, ELSE, MOSKOWITZ, EDELMAN  
& DICKER LLP

By: /s/ Michael P. McCloskey  
Michael P. McCloskey, Esq.

401 West A Street, Suite 1900

San Diego, CA 92101

Telephone: (619) 321-6200

Facsimile: (619) 321-6201

email: [michael.mccloskey@wilsonelser.com](mailto:michael.mccloskey@wilsonelser.com)

[sarena.kustic@wilsonelser.com](mailto:sarena.kustic@wilsonelser.com)

*Attorneys for* PAYAM BOZORGI

**ECF ATTESTATION**

Pursuant to Local Rule 5-1(h)(3), on November 7, 2022, counsel for Payam Bozorgi  
authorized my office to affix the above electronic signature on his behalf, and concurred in the filing  
of this Stipulation and Proposed Order.

By: /s/ Carolyn Chang  
Carolyn Chang

**ORDER**

Having reviewed the foregoing Stipulation, and finding good cause therefore, this Court hereby orders:

1. The hearing on the Motion for Attorneys' Fees (Dkt#159) shall be continued from November 30, 2022 to December 14, 2022, at 2:00 p.m.;
2. The Regents' Opposition to the Motion shall be due November 22, 2022;
3. Borzorgi's Reply to the Motion shall be due November 29, 2022.

SO ORDERED.

Dated: November 8, 2022



HON. WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE